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BUREAU OF LAND MANAGMENT COLORADO STATE OFFICE ATTN: COMPETITIVE OIL & GAS LEASE SALE 2850 YOUNGFIELD STREET LAKEWOOD, CO 80215

Reference Number: OIL & GAS LEASE SALE



BOARD OF COMMISSIONERS

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LEE A. STAAB
County Manager
ALAN N. HASSLER
County Attorney

Tuesday, March 28, 2017

Bureau of Land Management Colorado State Office Attn: June 8, 2017 (aka May 11, 2017) Competitive Oil and Gas Lease Sale 2850 Youngfield St. Lakewood, CO 80215

and

Delivered via electronic mail to:

blm co may 2017 lease sale@blm.gov

Ruth Welch, BLM CO State Director (rwelch@blm.gov)

Greg Shoop, BLM CO Associate State Director (gshoop@blm.gov)

Lonny Bagley, BLM CO Deputy State Director, Energy Lands and Minerals (lbagley@blm.gov)

Courtney Whiteman, BLM CO Public Affairs Specialist (cwhiteman@blm.gov)

Andrew Archuleta, BLM CO Northwest District Manager (aarchule@blm.gov)

RE: GRAND COUNTY, CO PROTEST under regulation 43 CFR 3120.1-3 for the June 8, 2017 (aka May 11, 2017) Oil and Gas Lease Sale and Environmental Assessment for the May 11, 2017 Competitive Oil & Gas Lease Sale DOI-BLM-CO-NO5-2016-0099-EA

Dear BLM Colorado State Field Office:

The Grand County Board of County Commissioners are respectfully filing a protest to the June 8, 2017 Competitive Oil and Gas Lease Sale and Environmental Assessment DOI-BLM-2016-CO-NO5-2016-0099-EA, specifically, the inclusion of all the Grand County parcels that are up for sale. The parcels being protested are referenced in TABLE 1 (top of page 2) by Serial Number and acreage as is required by BLM rules for submitting a protest.

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TABLE 1
Grand County Parcels
June 8, 2017 Competitive Oil & Gas Lease Sale

BLM PARCEL	ACREAGE
1	ACKEAGE
SERIAL#	
COC-78284	1,362.710
COC-78285	2,537.860
000-70205	a,3371000
000 00000	4.000.000
COC-78286	1,873.800
	,
COC-78287	360.000
COC-78288	1,626.660
COC-70200	1,020.000
COC-78289	2,212.610
COC-78290	2,390.410
COC-78291	1,258.200
COC-70291	1,230.200
COC-78292	1,239.130
COC-78293	1,512.150
	-,
COC-78294	232.870
COC-76294	232.670
COC-78295	2,025,760
COC-78296	1,580.230
	'
COC-78300	1,647.040
300-7000	1,077.070
COC 70004	4.404.000
COC-78301	1,186.200
COC-78302	1,523.490
COD-78303	1,678.480
COD-78304	1.101.020
COD-78304	1,101.920
COD-78314	110.34
COD-78315	40.00
TOTAL ACRES	27 400 960
TOTAL ACKES	27,499.860

Furthermore, the County is protesting the fact that the Environmental Assessment that was completed for this proposed oil and gas lease sale failed to present a range of alternatives. It considered leasing as the only action, with no other scenarios. This narrow scope is an "all or nothing" approach, which is clear violation of the National Environment Protection Act (NEPA).

Grand County has a vested interest in the health, safety and welfare of its citizens and the protection and appropriate utilization of lands and natural resources within our jurisdiction. In support of our protest Grand County is providing the following comments:

Grand County and its Board of Commissioners are opposed to the proposed lease sale of 27,500 acres in Grand County for future oil and gas development. These parcels and the County itself are geologically characterized as currently having low or no potential for oil and gas development. There is no oil and gas activity in Grand County today, and over the past years there have been more than 50 oil or gas wells drilled and each has been abandoned because of no production. These previously drilled wells are located in predominantly the same or similar areas as the proposed oil and gas lease sale. We recognize the importance of this resource to our state and national economy, however, the presence and number of these dry and abandoned wells should be proof that Grand County does not have viable oil and gas resource.

The only rationale provided for inclusion of the Grand County parcels in the proposed lease sale is to clear a group of deferred parcels that were set aside almost 10 years ago when BLM commenced the revision to the Kremmling Field Office Resource Management Plan. These parcels are not being nominated as a result of new Expressions of Interest from the oil and gas industry or individuals. Nor are these parcels located over the McCallum Oil Field. Drilling for oil and gas in Grand County will come only with significant effort, investment and costs and harm to our environment and economy, while there is not economic or resource justification for such activity.

The appropriateness of the Grand County parcels in this lease sale as a viable and developable resource is questionable. Furthermore, the potential environmental and socioeconomic impacts of the effects of drilling will severely hinder achieving the vision for our community as outlined in the Grand County Master Plan. Grand County's success and sustainability is linked directly to tourism/recreation related opportunities and business that are complimentary to outdoor recreation and tourism which requires protecting natural resources as they exist today, without oil and gas development.

The nominated parcels that are being considered with the lease sale are located in Central and Western Grand County, which is primarily rural, agricultural, undeveloped forest or public land with high wildlife habitat, scenic and recreation based values. Key natural areas include: Arapaho National Forest, the Colorado River, Willow Creek, Willow Creek Reservoir, Elk Mountain, Grouse Mountain, Byers Canyon and many stream tributaries to the Colorado River. The tributaries are Trail Creek, Willow Creek, Drowsy Water Creek, McQueary Creek, Sheriff Creek, Ute Bill Creek, First Creek, Second Creek and several other un-named water courses. US 40, SH 125 and US 34 also run through or are adjacent to this area and each are scenic corridors in their own right. US 40 is a designated Colorado Scenic Byway. Rocky Mountain National

Park exists in close proximity, and is the third most visited park in the United States. To reach the Park, tourists would be travelling through these potential lease areas. The sight of oil wells and the attendant facilities needed for their support would severely lessen the attraction of visiting this priceless resource. There is an abundance of recreation in this area that serves resort ranches, outfitters, hunting and fishing, hiking and trail running, mountain biking, cross country skiing, snowshoeing and snowmobiling. The area is also an important habitat for elk, deer, eagles, falcons, Greater Sage Grouse and native species of cutthroat trout. Lastly, on the southern edges of the proposed oil and gas lease sale, are the towns and communities of Granby, Hot Sulphur Springs, and Parshall that rely on this area for its scenic, resource, recreation and economic attractions for their residents and visitors.

The County feels that the impending development of Oil and Gas would have drastic negative consequences on our local environment, infrastructure and economy, as are more particularly described below:

RECREATION/TOURISM ECONOMY

Grand County enjoys strong tourism because of its proximity to Rocky Mountain National Park, Arapaho National Recreation Area, Arapaho National Forest and Indian Peaks Wilderness Area. It is the County's goal to continue to improve and develop our tourism based economy, and protecting our natural resources is vital to this goal. Critical to this will be the protection of view corridors, wildlife habitat, night sky, and natural spaces so they remain attractive for tourism and outdoor recreation purposes.

Recreation based tourism accounts for over 4,200 jobs in the county. As our county has only approximately 15,000 full-time residents, this is considerable and in fact tourism is the primary driver of our economy. For example, hunting, fishing and wildlife watching activities in Grand County alone accounts for approximately \$50 million in direct and secondary spending. Our tourism-based economy with its links to natural resource protection is also helping the County conserve our ranching heritage through working resort dude ranches, like C Lazy U and Drowsy Water. The following will provide an idea of the values these businesses contribute to Grand County:

C Lazy U Ranch.

- 1. The C Lazy U is an historic resource having started in 1919 making it nearly 100 years old. The C Lazy U barn was built in 1925 and the lodge was constructed in 1947 with logs felled from the Baldy hillside behind the lodge. The unique design of the lodge (suspension of second floor to avoid log posts on the ground floor to accommodate square dancing) was overseen by the Schoenbergers and set the tone for the rustic mountain elegance that would define the ranch for years to come.
- 2. The ranch is an important part of our County and State history and culture. Guest or "dude" ranches are disappearing across the American West.

- 3. C Lazy U is one of the best examples of a large landholding that is preserving Grand County's ranching heritage and equestrian traditions. The wranglers at the C Lazy U practice natural horsemanship and in the tradition of the "buckaroo". Wranglers work on horseback, not on four-wheelers, just as they did a century ago.
- 4. The ranch provides valuable tourism and recreational attributes. C Lazy U and its local fishery, Willow Creek, is an Orvis endorsed lodge.
- 5. The ranch preserves view sheds from Highway 125 across the Willow Creek Valley, which are very important scenic and visual assets to the County. The view across the ranch is enjoyed by thousands of public travelers.
- 6. The ranch employs approximately 50 year-round staff and 150 seasonal staff to accommodate the 4,000 guests each year.
- 7. The ranch hosts community events and charitable fundraisers to help the local community.
- 8. The four adjacent ranch communities (Homesteads, Dexter Meadows/Dexter Ridge, Aspen Springs and Chimney Rock Cabins) provide residential uses and continuity to the C Lazy U community. These residences are a valuable source of property tax dollars for the County and oil and gas development would almost certainly conflict with the surface uses of these residences. The ranch's riding program for children is world-renown and exposes youngsters to a wholesome outdoor experience. Real safety concerns arise from introducing oil and gas traffic and development as a conflicting surface use.
- 9. The payroll, revenues from ranch operations and related tourism and recreational dollars are essential to the local economy of Grand County.

Drowsy Water

- 1. A large portion of Drowsy Water operates utilizing a Special Recreation Permit on the adjoining public BLM lands.
- 2. Drowsy Water has been owned and operated by the Fosha Family for 40 years, and it has been a guest ranch in the County since the 1930's.
- 3. The ranch averages 2,300 user days each summer and activities are designed to provide folks with a heritage outdoor experience free of motorized vehicles in the Colorado High County.
- 4. Drowsy Water employs 30 people to accommodate approximately 700 summer guests.

- 5. The ranch provides an authentic western vacation focusing around horseback riding, moving cattle, kids' programs, hiking and enjoying the ranch private lands and surrounding federal lands.
- 6. The ranch provides valuable conservation, tourism and recreational attributes.

Oil and gas development presents many challenges to Grand County: (1) financial impacts, such as roads, fire, Emergency Medical Services and police; (2) increased wildfire hazards because of development being located in pine beetle effected areas of the county; (3) reduced economic value to our public lands for their scenic and recreational values and reduced county and municipal revenues (sales, lodging and property tax); and (4) added negative threats to our water supply in the form of pollution from oil spills to byproducts of the drilling business such as increased erosion from the land and trees that must be cleared.

Grand County's legacy and its success will be based in its natural, cultural and historic heritage by and through a tourist/recreation-based economy; not the oil and gas industry. Oil and gas development will not complement or enhance the County's desired rural character and natural setting that sustains quality of life for our residents, visitors and businesses.

GEOLOGY

The landform in the proposed leased area consists of narrow, steep valleys that follow the tributary headwaters to the Colorado River. The region is characterized by significant faulting, which may prohibit effective containment of hydraulic fracturing fluids beneath aquitards or what would otherwise be confining geologic layers. The area proposed for leasing also contains an abundance of geological formations that contain expansive soils, are mapped by the U.S. Geological Survey as landslide, or that are prone to landslides, such as the Troublesome Formation (see FIGURE 1). In Grand County's experience with a landfill located to the south of parcel 7821, several water quality monitoring wells have been sheared off due to a buried slide plane that is perpendicular to the land surface. Complex slip planes such as these do not tend to show up on USGS maps, but a simple drive along the Colorado River will demonstrate that they are extremely common in the region. Leasing lands for oil and gas development that contain geologic formations that are known to slide would be irresponsible. Well development in these regions poses a serious threat to water quality due to the threat of pollution from oil or gas drilling fluids moving into aquifers from these faults.

Hot Sulphur Springs is named for its geothermal resource and it serves as the main tourist attraction for the town. The town is also bisected by the Mount Bross Fault. Oil and gas development in the parcels around Hot Sulphur Springs could alter the hydrodynamic regime that support the hot springs. In addition, contamination from fracking fluids or other pollution could enter the hot springs. Either possibility could destroy the hot springs and ruin this resource for future generations.

The BLM must also consider the fact that Grand County, and particularly the proposed oil and gas lease parcels, are not located in one of Colorado's major oil and gas basins. Grand County is not a resource area for oil and gas development. Furthermore, the area is constrained topographically. The areas is accessed by a primitive road system with seasonal access only. These road are narrow, with steep grades and switchbacks. It is made up of many steep valleys that have slopes ranging from 30% to 45% and an abundance of streams and creeks. The costs to overcome the terrain will make oil and gas development even less economically viable for a company or individual.

DEVELOPMENT ACCESS AND INFRASTRUCTURE

The area where the lease parcels are located is served by a road system that consists of narrow roads, steep grades, sharp curves and in many cases, only seasonal access. The area is primarily not accessible by vehicle from December to May each year. The road system as designed is not adequate for the construction vehicles associated with oil and gas development. Road improvements to access this area would definitely require intersection improvements where BLM, County or Forest Service roads connect with US 40. Furthermore, the roads would have to be improved in width, grade, curves and load capacity to adequately serve the type of traffic associated with oil and gas. Due to terrain, the improvements would require significant cuts and fills resulting in significant scarring of the landscape. These improvements would also come at a highly significant cost to the company or individual trying to develop these parcels. Road improvements of this magnitude would result in unacceptable impacts to the mountain landscape due to increased use, construction, traffic, dust, sediment and erosion. Our concern is that much of this sediment and erosion, potentially carrying un-natural substances, will end up in the streams and rivers.

WILDLIFE AND FISH

The proposed lease sale parcels are located in important wildlife habitat:

- Severe winter range, winter concentration areas and migration corridors for mule deer, elk, moose and pronghorn (see FIGURE 2 and FIGURE 3).
- A significant portion of the leased parcels are located in sagebrush vegetation that is integral priority and general habitat for the Greater Sage Grouse. Grand County, Colorado Parks & Wildlife, BLM and the Middle Park Sage Grouse Working Group have made significant efforts to protect this habitat as set forth in the Middle Park Sage Grouse Conservation Plan and BLM Sage Grouse Final EIS. To lose this habitat may result in an endangered species listing for the Sage Grouse with negative spill over economic impacts to agriculture (i.e., loss of grazing lands) and recreation on this valuable public resource.
- Nesting habitat for raptors (eagles and falcons) along the Colorado River and tributaries along US 40 and SH at the edges of the proposed leased parcels.

- Native cutthroat trout in Kinney Creek
- Core habitat areas --- Parshall Divide, Sulphur Gulch

Oil and gas development will only contribute to further disruption and fragmentation of these important habitat areas and will restrict wildlife movement and migration due to new permanent structures, roads and other oil and gas facilities and activities. This habitat is important to the County's economic, recreational and environmental values.

County plans require that development minimize its impacts to critical wildlife habitat and corridors by directing new growth and development into areas where it can be served by adequate, roads, water, sewer, utilities, schools, parks, trails, housing, emergency services and public safety. We do this primarily to preserve the rural and mountain landscapes of Grand County. The improvements that will be required in support of oil and gas development on the proposed lease sale parcels will only serve to degrade the character of Grand County's landscapes and wildlife habitats.

WATER RESOURCES

The headwater of the Colorado River originate within Grand County and many tributaries to the Colorado River run through the proposed lease parcels. The creeks include; Trail Creek, Willow Creek, Drowsy Water Creek, McQueary Creek, Sheriff Creek, Ute Bill Creek, First Creek, Second Creek and several un-named water courses. Water quality in all of these Creeks and water courses is of concern, as they provide irrigation water to several area ranches that are critical to the ranching and outdoor recreation economy in Grand County. These tributaries are also linked through surface and ground water to the water supplies of the towns of Granby, Hot Sulphur Springs, Hot Sulphur Springs Resort, Grand County Government Offices and C Lazy U and Drowsy Water Guest Ranches. The region also contains a high number of individual domestic wells for nearby residences.

Several of the parcels are located in the Willow Creek drainage area flowing into Willow Creek Reservoir, which is a part of the Colorado-Big Thompson (C-BT) Project. Portions of some of the parcels may also drain to Coyote Creek, a tributary to Windy Gap Reservoir, which utilizes C-BT facilities for the conveyance of water. The C-BT Project supplies water to about 860,000 people and 650,000 acres of irrigated farmland in Northern Colorado. Any degradation of these waters has the potential to impact water quality in Willow Creek Reservoir, Granby Reservoir, Shadow Mountain Reservoir, Grand Lake, and several Front Range reservoirs, as well as hundreds of thousands of people.

Historic flows in the Colorado River between Granby Dam and the Williams Fork River have been reduced significantly due to trans-basin diversions which carry water to front-range cities and farms. That number is set to be further reduced with the expansion of Gross Reservoir and construction of Chimney Hollow Reservoir. Replacement water to compensate for these current diversions does not begin to enter the Colorado River until its confluence with the Williams Fork

River. As a result, it creates a depleted stretch of the Colorado River that is adjacent to the area of the proposed lease sale. Currently this stretch of the Colorado is subject to low flows, warmer water temperatures, and depleted species of food necessary for a strong cold water fishery. Tremendous efforts have been made to protect this reach of the Colorado River through complicated Windy Gap Agreement and Colorado River Cooperative Agreement negotiations. The agreements have resulted in the commitment of time and energy on the parts of several diverse agencies to protect and, where possible, to enhance the condition of the Colorado River through an ongoing collaborative effort called Learning by Doing. In addition, a project called the Windy Gap Connectivity Channel that would cost nearly \$10 million is being pursued to reconnect the Colorado River and help restore the proper functioning condition and aquatic habitat to reverse extirpation of mottled sculpin, giant stonefly, and other macroinvertebrate species in the Colorado River downstream of Windy Gap. It is questionable whether this reach of the Colorado River would have the ability to recover from additional impacts such as the potential pollution from fracking fluids, disposal of produced water, accidental spills, and the developmental impacts that could be caused by oil and gas operations in this area.

Grand County has a growing concern regarding availability of water to support the current and future population and tourism sector. Adding large industry, such as Oil and Gas, would put even further strain on this valuable resource. Water resources such as the Colorado River and many local lakes are also major tourist and recreation attractions. The heavy water needs adherent to Oil and Gas development would put a strain on these water bodies, thus endangering the features of these attractions and the investments in these assets that we have made as both a Count and community.

AIR QUALITY

The oil and natural gas industry includes a wide range of operations and equipment, from wells to natural gas gathering lines and processing facilities, to storage tanks, and transmission and distribution pipelines.

The oil and gas industry is a significant source of methane emissions, a potent greenhouse gas with a global warming potential more than 25 times that of carbon dioxide. Oil and gas is also the largest industrial source of emissions of volatile organic compounds (VOCs), a group of chemicals that contribute to the formation of ground-level ozone (smog). Exposure to ozone is linked to a wide range of health effects, including aggravated asthma, increased emergency room visits and hospital admissions, and premature death.

In addition to helping form ozone, VOC emissions from the oil and gas industry include air toxics such as benzene, ethylbenzene, and n-hexane. Air toxics are pollutants known, or suspected of causing cancer and having other serious health effects.

Fracking has been linked to increased air pollution that is hazardous to the health of residents near wells, and may contribute to the larger problem of climate change. Fracking creates many opportunities for the release of air pollutants. The construction of drilling pads results in air pollution, as does the increased truck traffic back and forth from the well sites. Drilling itself

results in more air pollution from diesel fuel engines, evaporation of wastewater, release of fracturing fluid, flaring of wells (burning or venting of gas at the wells), condensate material, and fugitive emissions from compressor stations. A report in the Scientific American found that fracked wells leak 40 to 60 percent more methane than conventional natural gas wells.

The towns of Grand Lake and Granby, Rocky Mountain National Park and Indian Peaks Wilderness are all located in the air shed of the emissions from oil and gas development on the nominated lease parcels. These emissions will impact the opacity of the air and create serious health effects. Clean and clear skies are an important part of visual quality for our beautiful landscape and the tourism/recreation economy in Grand County.

ROCKY MOUNTAIN NATIONAL PARK

Rocky Mountain National Park's (RMNP) 415 square miles encompass and protect spectacular mountain environments. It includes Trail Ridge Road – which crests at over 12,000 feet including many overlooks to experience the subalpine and alpine worlds – along with over 300 miles of hiking trails, wildflowers, wildlife, starry nights, and fun times. In a world of superlatives, Rocky is on top! In 2015, RMNP had more than four million recreational visitors from across the United States and the world, making it the third most visited national park in the USA. It is only seven (7) miles from the eastern edge of the proposed oil and gas lease sale. New roads, well pad development, emissions, traffic, and night-lighting that would be associated with oil and gas activity would have severe negative impacts to this national park.

CULTURAL/HISTORIC RESOURCES

Grand County culture and history is based in agriculture and tourism. A great deal of the area that is in the proposed oil and gas lease sale was previously Ute Indian settlements and hunting grounds. The areas around Hot Sulphur Springs were considered sacred, especially the hot springs that are located at the base of Mount Bross. The area was also explored by mountain men like William Jefferson "Ute Bill" Thompson. His historic path is along Ute Bill Creek just north of Hot Sulphur Springs to the areas surrounding Elk and Grouse Mountains. The homes, tools, paths and other artifacts of the Ute Indians and explorers like Ute Bill still remain in this area and remain in a fragile state as they were made from local sources (land, vegetation, soil and fiber). High impact development like that of oil and gas development could very easily destroy this history. These stories of our history and culture are played out and told by the Grand County Historical Association for the benefit of the Heritage Coalition of Grand County. Our history and heritage is important to our quality of life and to the visitors of Grand County and they need to remain preserved and intact.

PUBLIC REVIEW AND COMMENT

As county commissioners in a public lands county, we know first-hand how important it is for federal land managers to work with local communities. Many of our citizens travel on roads

across federal lands to get to work every day and many families and businesses make their living working our county's natural resources. Those that live, work and raise their families is our county know that our communities are linked to the land.

The BLM over the last few years has been recommending the recently adopted Planning 2.0 for its improved public involvement process. Planning 2.0 is the agency's means to improve decision making, add transparency and provide early, meaningful public involvement. All government agencies, including local government, strive for planning programs that are efficient, transparent, responsive to change, have opportunity for meaningful public involvement and broad community buy-in from elected officials to private citizens.

The County recognizes that Planning 2.0 was done for Resource Management Plans and their adoption process. However, if public involvement is a main tenet for BLM resource planning then the same or similar principle should apply with oil and gas development review. The BLM has as one of its responsibilities under the Mineral Leasing Act the requirement to promote development of oil and gas. The development of oil and gas and the decisions leading to that development must be coordinated and shared because the management of this landscape is shared amongst federal agencies, including the BLM, towns, counties and other forms of local governments. Each entity involved will have varying goals, plans and policies regarding land use and management. The BLM leasing process recommends stakeholder coordination prior to public scoping. Grand County was not consulted or contacted on this matter and no public meetings were held in the County until we requested one. Local county governments can be invaluable allies to federal land managers when it comes to land use matters. The necessity for local government to be close to its land and its people makes us a significant resource.

Oil and gas development is a land use that because of its potential impact must be reviewed in depth in order to understand: (1) the economic potential for the resource; (2) the areas where it is most likely to take place; (3) the means for maintaining and improving the condition of natural resource values in the area; (4) the phasing and timing of development; (5) the improvements or infrastructure that will be needed to service the new development; and (6) the best protection measures and best management practices for oil and gas development. Due to the limited potential for oil and gas development in Grand County we are not recommending a Master Leasing Plan, only better analysis and greater coordination for the review and decision making related to oil and gas planning and development.

Grand County sincerely appreciated the White River Field Office and NW Regional Director appearing before the BOCC to provide an overview of the leasing process and to answer public questions. This is the type of action that should have been done in June or July, well in advance of public scoping and review of the EA.

CONCLUSION

• The "all or nothing" or "limited scope" approach of the Environmental Assessment that was completed for this proposed oil and gas lease sale failed to present any alterative actions to leasing, which is a clear violation of NEPA.

- These parcels and the County itself are geologically characterized as having low or no potential for oil and gas development.
- There is no oil and gas activity in Grand County today and over the past 50 years there
 have been 59 oil or gas wells drilled and each has been abandoned because of no
 production.
- There is no demand for the nomination of these parcels by companies or individuals.
- Leasing lands for oil and gas development that contain geologic formations that are known to contain faults and slides would be irresponsible and thus development in this area poses a serious threat to water quality.
- The Colorado River does not have the ability to absorb or recover from additional impacts such as the potential pollution from fracking fluids, disposal of produced water, accidental spills, and the development impacts that could be caused by oil and gas operations in this area.
- Adding large industry, such as Oil and Gas, would put even further strain on valuable
 water resources. Water resources such as the Colorado River and its tributaries, and many
 local lakes are major tourist and recreation attractions. The water needs adherent to Oil
 and Gas development would put a strain on these water bodies, thus endangering the
 features of these attractions and the investments in these assets that we have made as both
 a Count and community.
- Degradation to the Colorado River and its tributaries has the potential to impact water quality in Willow Creek Reservoir, Granby Reservoir, Shadow Mountain Reservoir, Grand Lake and for Hot Sulphur Springs, Hot Sulphur Springs Resort, Grand County, C Lazy U and several Front Range reservoirs, as well as hundreds of thousands of people and acres of land.
- On and off-site improvements result in unacceptable impacts to the mountain landscape due to increased use, construction, traffic, dust, emissions, sediment and erosion.
- Critical wildlife habitat would be significantly segmented or lost as a result of oil and gas development.
- It would create unacceptable impacts to Rocky Mountain National Park, a key natural and economic asset for Grand County and the State of Colorado.
- Our history and heritage is impacted as a result of oil and gas development occurring here in Grand County, which are important the quality of life for our residents and visitors.
- The payrolls and revenues from tourism and recreation operations and other related tourism and recreational dollars that are essential to the local economy of Grand County

will be negatively impacted by oil and gas development in the lease sale area. This impact will be most apparent with C Lazy U and Drowsy Water Guest Ranches.

County air quality will be negatively impacted by the emissions from oil and gas
developing through reduced opacity of the air and polluted air that will cause serious
health effects.

In conclusion, Grand County requests that the BLM withdraw the nominated parcels from the June 8, 2017, competitive lease sale. In the event that the BLM proceeds to offer these parcels, Grand County requests that you make all bidders aware and informed of our protest and our position on oil and gas development in Grand County. Finally, we request that the BLM Kremmling Field Office initiates a revision to the Resource Management Plan for the closure of all of Grand County's portion of the Kremmling Resource Area to oil and gas development.

Sincerely.

Kristen Manguso

Commissioner Chair

Merrit Linke Commissioner Richard Cimino Commissioner

Cc: The Honorable John Hickenlooper, Governor, Colorado

The Honorable Michael Bennet, United States Senate

The Honorable Cory Gardener, United States Senate

The Honorable Jared Polis, US House of Representatives

Representative Randy Baumgardner, State House of Representatives, Colorado

Representative KC Becker, State House of Representatives, Colorado

Board of Trustees, Town of Kremmling

Board of Trustees, Town of Granby

Board of Trustees, Town of Grand Lake

Board of Trustees, Town of Hot Sulphur Springs

Board of Trustees, Town of Fraser

Board of Trustees, Town of Winter Park

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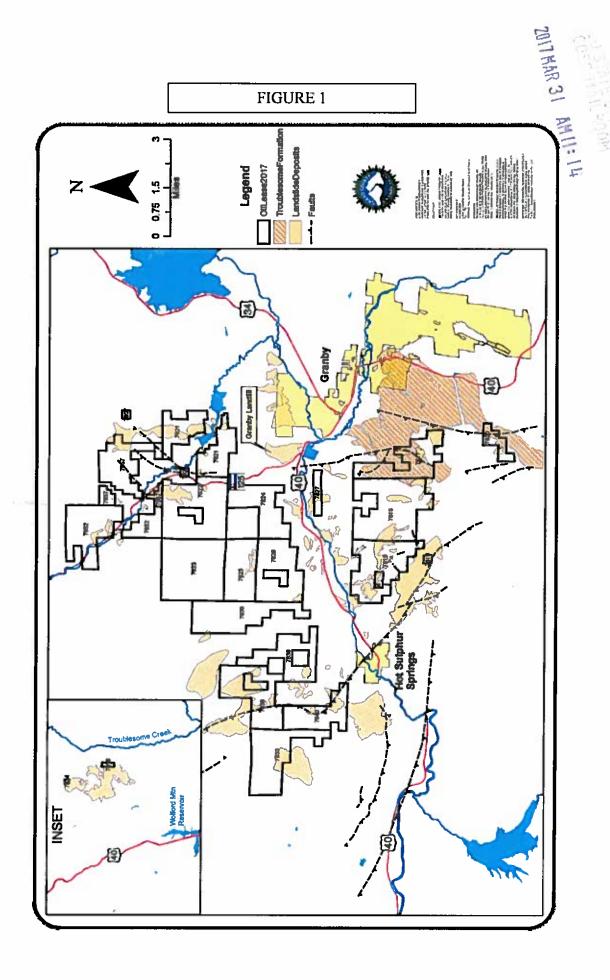


FIGURE 2

